

1 BRIAN BAKER, ESQ. (#85883)
2 1757 PACIFIC AVENUE, SUITE B
3 LONG BEACH, CALIFORNIA 90813
Telephone: (562) 218-3132
Facsimile: (562) 218-3133

4 Attorney for Veriscape, Inc.; Charles Wurtz;
Regina Rygelis; Gary Berkowitz; Brian Roe
5 and Renee Tadlock

6 ROBERT N. BURMEISTER, JR. (#74203)
7 702 MARSHALL STREET, SUITE 500
REDWOOD CITY, CALIFORNIA 94063
Telephone: (650) 363-8666
Facsimile: (650) 367-7130

9 Attorney for Veriscape, Inc.; Charles Wurtz;
Regina Rygelis; Gary Berkowitz and Brian Roe

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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

14 DAN L. WHITNEY, JANET R. HADLEY,) CASE NO. CO405232
15 MARGARET A. KORNOW-BROWN, ERIC)
BRELLE,)
16 Plaintiffs,) STIPULATION AND ORDER
17 vs.) CONTINUING MOTION FOR
18 CHARLES WURTZ, VERISCAPE, INC.,) ORDER RELEASING DOCUMENTS
19 RENEE TADLOCK, REGINA RYGELIS,) FROM PROTECTIVE ORDER AND
WILL ARNTZ, SAM JACOB, GARY) MOTION TO COMPEL
BERKOWITZ, BRIAN ROE, and DOES 1) PRODUCTION OF DOCUMENTS
20 TO 20, inclusive,)
21 Defendants.)
22)
23 AND RELATED CROSS-ACTIONS.)
24)

STIPULATION

25 This Stipulation is entered into by and between plaintiffs, DAN L. WHITNEY, JANET R.
26 HADLEY, MARGARET A. KORNOW-BROWN and ERIC BRELLE, and defendants, CHARLES
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1 WURTZ, VERISCAPE, INC., REGINA RYGELIS, GARY BERKOWITZ, and BRIAN ROE, by
2 and through their attorneys of record herein with reference to the following facts:

3 1. On November 20, 2006, plaintiffs filed a Motion for Order Releasing Documents
4 from Protective Order. On that same day, defendant VERISCAPE filed a Motion to Compel
5 Production of Documents. The Motion for Order Releasing Documents from Protective Order was
6 set for January 30, 2007 and the Motion to Compel Production of Documents was set for January
7 16, 2006.

8 2. At the Case Management Conference on November 21, 2006, the attorneys for the
9 moving parties requested that both motions be heard on January 30, 2007.

10 3. On December 15, 2006, the court ordered that the hearing date for defendant
11 VERISCAPE's Motion to Compel Further Responses to Demands for Production of Documents be
12 continued to January 30, 2007. Defendants' attorney, Brian Baker, who will be responding to the
13 Motion for Order Releasing Documents from Protective Order, will be out of the country until after
14 the last date for filing a response to said motion and accordingly, counsel have agreed that the two
15 motions should be continued one week, to February 6, 2007.

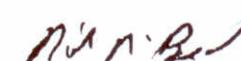
16 WHEREFORE, IT IS HEREBY STIPULATED by and between plaintiffs, DAN L.
17 WHITNEY, JANET R. HADLEY, MARGARET KORNOW-BROWN and ERIC BRELLE and
18 defendants, CHARLES WURTZ, VERISCAPE, INC., REGINA RYGELIS, GARY BERKOWITZ,
19 and BRIAN ROE, by and through their counsel as follows:

20 A. The Motions for Order Releasing Documents from Protective Order and to Compel
21 Production of Documents, currently set for hearing on January 30, 2007, shall be continued to
22 February 6, 2007.

23 DATED: December 22, 2006


ROBERT N. BURMEISTER, JR.
Attorney for Defendants

25 DATED: December 22, 2006


DAVID R. BECK
Attorney for Plaintiffs

1 ORDER

2 IT IS HEREBY ORDERED that plaintiffs, DAN L. WHITNEY, JANET R. HADLEY,
3 MARGARET A. KORNOW-BROWN and ERIC BRELLE ~~xxxx~~ the Motion for Order Releasing
4 Defendants' Motion
Documents from Protective Order and to Compel Production of Documents, currently set for hearing
5 on January 30, 2007, shall be continued to February 6, 2007

6 DATED: January 3, 2007



7 PATRICIA TRUMBULL
8 Judge of the United States District Court

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